

1 Matthew W. Park  
 2 Nevada Bar No. 12062  
 3 LEE KIEFER & PARK LLP  
 4 1707 Village Center Circle, Suite 150  
 5 Las Vegas, NV 89134  
 6 Phone: 702-333-1711  
 7 Email: [matt@lkpfirm.com](mailto:matt@lkpfirm.com)

8  
 9 *Attorneys for Defendant*  
 10 INMODE LTD., a Foreign Limited  
 11 Liability Corporation

12  
 13 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

14 Dr. F. VICTOR RUECKL, an individual,

15 Plaintiff,

16 v.

17 INMODE LTD.,

18 Defendants.

19 Case No. 2:19-cv-02186-KJD-NJK

20  
**STIPULATION AND PROPOSED**  
**ORDER TO EXTEND TIME TO FILE**  
**REPLY IN SUPPORT OF DEFENDANT**  
**INMODE LTD'S MOTION TO DISMISS**

21  
**[SECOND REQUEST]**

22 Plaintiff Dr. F. Victor Rueckl (“Plaintiff”) and Defendant InMode Ltd., a Foreign Limited  
 23 Liability Corporation (“Defendant”), by counsel and pursuant to Local Rule IA 6-1, stipulate to  
 24 continue Defendant’s deadline to file a Reply in support of its Motion to Dismiss (ECF No. 10) to April  
 25 24, 2020:

26  
**STIPULATION**

27 1. On February 7, 2020, Defendant filed a Memorandum of Points and Authorities in  
 28 Support of Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(B)(2) and (6) (ECF No. 10) (“Motion to  
 29 Dismiss”).

30 2. On March 20, 2020, Plaintiff filed his Opposition to Defendant’s Motion to Dismiss  
 31 (ECF No. 17) (“Opposition”).

32 3. Defendant’s Reply in Support of the Motion to Dismiss (“Reply”) is currently due on  
 33 April 10, 2020.

34 4. However, due to the significant law firm and business disruption due to the COVID-19  
 35 outbreak, including the need to obtain and verify information in locations where public health stay-at-  
 36 home orders have made it difficult to do so, and in order to adequately respond to the allegations raised



1 by the Opposition, the Defendant respectfully requests an extension until **April 24, 2020** to file the  
2 Reply.

3 5. Defendant's counsel conferred with Plaintiff's counsel regarding this stipulation and  
both parties agree to the requested extension.

4 6. This Stipulation is filed in good faith and not for any dilatory or other improper purpose.  
Plaintiff will not suffer any prejudice if the Court permits Defendant the requested extension of time.  
5 Plaintiff has consented to the requested extension.

6 7. This is the second request for extension of time for Defendant to obtain additional time  
to file its Reply in support of its Motion to Dismiss.

8 DATED: April 8, 2020

9 /s/ Matthew W. Park  
10 Matthew W. Park, Esq.  
Lee Kiefer & Park LLP  
11 1707 Village Center Circle, Suite 150  
Las Vegas, NV 89134  
(702) 333-1711  
matt@lkpfirm.com  
12 *Counsel for Defendant*

13 /s/ Jonathan K. Wong  
14 Joseph P. Garin, Esq.  
Jonathan K. Wong, Esq.  
Lipson Neilson P.C.  
9900 Covington Cross Drive, Suite 120  
Las Vegas, NV 89144  
(702) 382-1500  
jgarin@lipsonneilson.com  
15 *Counsel for Plaintiff*

16 **ORDER**

17 **IT IS SO ORDERED.**



18 UNITED STATES DISTRICT COURT JUDGE

19 DATED: 7/27/2020  
20 (nunc pro tunc)